

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

WAILIAN OVERSEAS CONSULTING GROUP,
LTD.,

Plaintiff,

v.

NEW YORK CITY REGIONAL CENTER LLC,

Defendant.

Case No. 17-cv-9004 (LLS)

**STIPULATION AND [PROPOSED]
ORDER REGARDING DISCOVERY
SCHEDULE**

WHEREAS, on December 16, 2021, the Court entered an order, extending the discovery schedule in this case (ECF No. 94);

WHEREAS, the current deadline to complete fact discovery is March 15, 2022;

WHEREAS, on February 15, 2022, Defendant, pursuant to Local Civil Rule 37.2 and Section 2(A) of the Court's Individual Practices, filed a letter motion requesting a pre-motion conference or, in the alternative, leave to file a motion to compel Plaintiff to produce its designated Rule 30(b)(6) witness, Ms. Jenny Liu, for a deposition or to designate an alternative corporate representative who is available to sit for a deposition (ECF No. 95);

WHEREAS, on March 3, 2022, the Court ordered Plaintiff to make Ms. Liu available to testify at a deposition within three months, or designate another 30(b)(6) witness who may so testify within the same time frame (ECF No. 100).

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by the undersigned counsel on behalf of Plaintiff and Defendant that the following discovery deadlines shall apply:

	<i>Current Date</i>	<i>Proposed Amended Date</i>
Close of Fact Discovery	March 15, 2022	June 15, 2022
Exchange of Expert Reports	April 15, 2022	July 15, 2022
Rebuttal Expert Reports	May 13, 2022	August 16, 2022
Close of Expert Discovery	June 10, 2022	September 13, 2022

DATED: March 15, 2022

Stipulated and agreed to by:

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Attorneys for Defendant

SO ORDERED.

This ____ day of March, 2022.

Louis L. Stanton
 United States District Judge